

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL W. TOLOMEO and SERAFIN
CHAVEZ, individually, and as
representatives of a Class of Participants
and Beneficiaries of the RR Donnelley
Savings Plan,

Case No. 1:20-cv-7158

Hon. Mary M. Rowland

Plaintiffs,

v.

RR DONNELLEY & SONS, INC., et al.

Defendants

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Plaintiffs Michael W. Tolomeo and Serafin Chavez ("Plaintiffs") respectfully move the Court to: (1) preliminarily approve the Parties' Class Action Settlement Agreement in the above-referenced matter, attached to Declaration of Paul M. Secunda as **Exhibit 1**; (2) approve the proposed Settlement Notice and authorize distribution of the Notices to the Settlement Class, attached to the Settlement Agreement as **Exhibit B**; (3) preliminarily certify the Settlement Class for settlement purposes; (4) approve the Plan of Allocation, attached to the Settlement Agreement as **Exhibit C**; (5) schedule a final approval hearing; and (6) enter the accompanying Preliminary Approval Order, attached to the Settlement Agreement as **Exhibit D**.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Paul M.

Secunda and exhibits attached thereto (including the Settlement Agreement), the Declarations of Michael W. Tolomeo and Serafin Chavez, and all files, records, and proceedings in this matter. Defendants join in the relief requested by Plaintiffs' Motion for Preliminary Approval of Settlement.

Dated this 22nd day of December, 2023

WALCHESKE & LUZI, LLC

/s/ Paul M. Secunda

Paul M. Secunda

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ATTORNEYS FOR PLAINTIFFS and
PROPOSED SETTLEMENT CLASS

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2023, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: December 22, 2023

s/Paul M. Secunda
Paul M. Secunda